

From: Robert Apgood <rob@carpelaw.com>
Subject: Violet Blue v. Johnson
Date: November 27, 2007 10:40:45 AM PST
To: colette@vogelelaw.com

Robert Apgood
In Address Book

Dear Ms. Vogeles:

When we last spoke approximately one week ago, I requested that your client stipulate to a severance of my client and a removal of your client's case against her to the Western District of Washington, where my client resides. During the course of that conversation you indicated that you would need to consult with your client and that you would contact me once you have a decision from her.

During the course of that conversation, I was unequivocally clear that Ms. Woofinden is a represented party and that this firm represents her. However, since then, I have been informed that you have contacted Ms. Woofinden directly. Please let there be absolutely NO confusion that Ms. Woofinden is a represented party and that the Rules of Professional Conduct in both California and Washington absolutely prohibit contact by an attorney with a represented party absent the presence or specific consent of that party's attorney. I have given no such consent. Please refrain from direct contact with my client in the future without my specific consent or outside of the presence of an attorney from this law firm.

I am arranging for local counsel in the N.D. California. Once acquired, I shall in due course be filing my application for admission pro hac vice to the N.D. California and shall file all pleadings on behalf of Ms. Woofinden upon that admission. Your client may save herself the potential costs and fees incurred by Ms. Woofinden in her motion to sever and remove by stipulating to the severance and removal. Otherwise, we shall be seeking those costs and fees as part of Ms. Woofinden's relief.

I look forward to your prompt response.

Regards,

Robert S. Apgood <rob@carpelaw.com>

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